

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

NGA TRUONG,	)	
Plaintiff	)	
	)	
v.	)	C.A. 12-12222-TSH
	)	
KEVIN PAGEAU, JOHN DOHERTY,	)	
THOMAS GAFFNEY, GARY J. GEMME,	)	
MICHAEL V. O'BRIEN and	)	
CITY OF WORCESTER,	)	
Defendants	)	
	)	

**STIPULATION OF DISMISSAL (WITH PREJUDICE)**  
**AND MOTION FOR RETENTION OF JURISDICTION**

Plaintiff, Nga Truong and Defendants, Kevin Pageau, John Doherty, Thomas Gaffney, Gary J. Gemme, Michael V. O'Brien and City of Worcester (City), having agreed to settle this matter, hereby stipulate, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), that this case is dismissed with prejudice, with all rights of appeal waived, and each party to bear its own costs and attorneys' fees. Because the settlement (a) provides for payments over the course of the next two years and (b) limits comment by the parties or counsel on the lawsuit and the terms of the settlement, the parties move the Court to enter an order providing that that the Court shall retain jurisdiction to enforce the terms of the settlement.

NGA TRUONG  
By her attorneys,

/s/ John C. Reinstein  
John C. Reinstein (BBO#416120)  
51 Abbottsford Road  
Brookline, MA 02446  
(617) 515-7986  
[jcreinstein@gmail.com](mailto:jcreinstein@gmail.com)

/s/ George F. Gormley  
George F. Gormley (BBO#204140)  
George F. Gormley, P.C.  
160 Old Derby Street, Suite 456  
Hingham, MA 02043  
(617) 268-2999  
gfgormley@aol.com

/s/ Edward P. Ryan, Jr.  
Edward P. Ryan, Jr. (BBO#434960)  
O'Connor and Ryan, P.C.  
80 Erdman Way, Suite 309  
Leominster, MA 01453  
(978) 534-1301  
edryan@oconnorandryan.com

KEVIN PAGEAU, JOHN DOHERTY,  
THOMAS GAFFNEY, MICHAEL V.  
O'BRIEN AND CITY OF WORCESTER  
By their attorneys,

/s/ David M. Moore  
David M. Moore (BBO#352580)  
City Solicitor  
Wendy L. Quinn (BBO#653954)  
Kevin M. Gould (BBO#661545)  
Assistant City Solicitors  
City Hall, Room 301  
455 Main Street  
Worcester, MA 01608  
(508) 799-1161  
moored@worcesterma.gov  
quinnwl@worcesterma.gov  
gouldk@worcesterma.gov

CERTIFICATE OF SERVICE

I, hereby certify that, on this 19<sup>th</sup> day of July, 2016, the within Stipulation of Dismissal (With Prejudice) and Motion for Retention of Jurisdiction was served upon all counsel of record through this Court's electronic filing system as identified on the Notice of Electronic Filing.

/s/ John C. Reinstein